In the Matter of:

Sony Group Corporation vs

VisionX Technologies, LLC

Telephonic Conference Call

May 24, 2023

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Sony Exhibit 1049
Sony v. VisionX
IPR2023-00296

1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD
3
4 ----------x
5 SONY GROUP CORPORATION,
6 Petitioner
7
8 v.
9
10 VISIONX TECHNOLOGIES, LLC,
11 Patent Owner
12 ----------x
13
14 VIA TELEPHONE
15
16 Before: The Honorable David C. McKone
17 The Honorable Christopher L. Crumbley
18 The Honorable Donna M. Praiss
19
20 Date: May 24, 2023
21 Time: 3:00 p.m.
22
23
24 Court Reporter: Nicole E. Lavigne, RPR, CSR

1 A P P E A R A N C E S
2
3 MICHAEL RADER, ESQUIRE
4 CHARLES STEENBURG, ESQUIRE
5 JASON BALICH, ESQUIRE
6 ADAM WICHMAN, ESQUIRE
7 JIE XIANG, ESQUIRE
8 Wolf, Greenfield & Sacks, P.C.
9 600 Atlantic Avenue, 23rd Floor
10 Boston, Massachusetts 02210
11 mrader-ptab@wolfgreenfield.com
12 Counsel for the Petitioner
13
14 MICHAEL FARJAMI, ESQUIRE
15 Farjami & Farjami LLP
16 26522 La Alameda Avenue, Suite 360
17 Mission Viejo, California 92691
18 mfarjami@farjami.com
19 Counsel for the Patent Owner
20
21
22
23
24

1 (Conference call commenced at 3:00 p.m.)
2 JUDGE McKONE: Good afternoon. This is a
3 conference call in Sony Group versus VisionX
4 Technologies, three interparty reviews, IPR 2023-00296,
5 298, and 389.
6 I am Judge McKone. With me is Judges
7 Crumbley and Praiss.
8 Is there anyone on the line for petitioner?
9 MR. RADER: Yes, your Honor. Thank you very
10 much. This is Michael Rader from Wolf Greenfield on
11 behalf of petitioner. I think we've got a couple of
12 other attorneys listening in, Charles Steenburg, Jason
13 Balich, Adam Wichman, and Jie Xiang.
14 And, your Honor, I believe we have a court
15 reporter on the line as well.
16 JUDGE McKONE: And you've raised for the
17 court reporter, Petitioner?
18 MR. RADER: We did.
19 JUDGE McKONE: Okay. So please, when you
20 get a copy of the transcript, please file it as an
21 exhibit in each of the three cases.
22 MR. RADER: Yes.
23 JUDGE McKONE: And, Mr. Rader, you'll be
24 doing the talking today for petitioner?

1 MR. RADER: That's my plan, your Honor, yes.
2 JUDGE McKONE: Okay.
3 Do we have anybody on the line for patent
4 owner?
5 MR. FARJAMI: Yes. Good afternoon, your
6 Honors. This is Michael Farjami from Farjami Farjami
7 LLP on behalf of the patent owner. And as far as I'm
8 aware, the cocounsel are not on the line. It's just
9 myself.
10 JUDGE McKONE: Okay. Especially since we
11 have a court reporter on the line, if anybody else
12 wishes to speak please first identify yourself and who
13 you represent.
14 Okay. My understanding is there's three
15 issues that we're being asked to talk about today.
16 I'll take them one at a time. The first issue, as I
17 understand it, is that petitioner requests leave to
18 file in each of the three cases a Sotera stipulation.
19 Petitioner, is that correct?
20 MR. RADER: That's correct.
21 JUDGE McKONE: Okay. Before I get into any
22 more detail on that, Patent Owner, is that something
23 that you're opposing?
24 MR. FARJAMI: Yes, your Honors. The reason

1 for opposition potentially is --
2 JUDGE McKONE: We'll get to that. I just --
3 we'll get to the why in a moment. I just wanted to see
4 if we needed to have a full discussion of that issue.
5 Since petitioner is asking for relief on that, I'll
6 start with petitioner and give them a chance to speak,
7 and then we'll allow patent owner to respond.
8 I guess first, Petitioner, have you served
9 the Sotera stipulation on patent owner?
10 MR. RADER: Yes, we have.
11 JUDGE McKONE: Okay. And is that something
12 that's already been filed in the district court or
13 something that you plan on filing in the future?
14 MR. RADER: It was a letter that we sent and
15 so, you know, we believe it's effective by sending them
16 the letter. We can certainly file it in the district
17 court as well, but we have not done that yet.
18 JUDGE McKONE: Okay. Well, go ahead on the
19 issue of the Sotera stipulations. I'll let you open it
20 up, Petitioner.
21 MR. RADER: All right. Thank you, your
22 Honor. So, again, it's Michael Rader. As I said, we
23 sent the letter. It addresses the Sotera stipulation
24 for all three proceedings, agreeing not to raise in the

1 district court any grounds that were raised or
2 reasonably could have been raised in any of the IPRs as
3 required to fit the bill as a Sotera stipulation.
4 We recognize that leave is required to file
5 anything, which is why we're making the request. In
6 terms of the timing of the Sotera stipulation, just a
7 couple of comments: One, in the precedential NXP case,
8 Director Vidal explained that the appropriate time for
9 filing it is before institution, of course not after.
10 More recently, in March, there was a panel of the Board
11 in IPR 2022-01311 that addressed the question of, well,
12 nevertheless, does the Sotera stipulation have to be
13 filed with the petition, and the answer was no. Under
14 the NXP case, it just has to be filed before
15 institution.
16 In this particular case, just in the
17 interest of transparency, I wanted to board to know why
18 we started in our petition with essentially a Sand
19 Revolution-type stipulation and we decided to switch to
20 a Sotera stipulation as I think the Board and Director
21 Vidal are encouraging parties to do, and the reason was
22 pretty simple:
23 At the time we filed the petitions, the time
24 to trial statistics in the Eastern District of Texas

1 were 24 and a half months; and as we explained under
2 the petition, that would put the final written decision
3 and the district court trial essentially simultaneously
4 in the same month.
5 Subsequent to that, at this time, the most
6 current statistics we're aware are that in the Eastern
7 District of Texas, it's dropped substantially from 24
8 and a half months down to 19 months. Although the
9 patent owner didn't pick that up in its POPR, we're
10 aware from reviewing board decisions that the Board
11 independently has picked that up and is aware of it.
12 And in light of that, substantial change which, you
13 know, could impact the balance of the Fintiv factors,
14 we decided to simply move it as a Sotera stipulation.
15 So I just wanted the Board to understand the
16 reasoning behind that.
17 JUDGE McKONE: Okay. Do you have anything
18 else before I let patent owner respond?
19 MR. RADER: That's -- no. That's it.
20 JUDGE McKONE: Okay.
21 Patent Owner, please now you can give us
22 your response.
23 MR. FARJAMI: Thank you, your Honors. The
24 primary objection that we have is that we were

1 compelled to extend time and allocate pages in the
2 preliminary response to respond to petitioner's Fintiv
3 arguments. We did not introduce any facts that were
4 not known to the petitioner. Despite the statement
5 that the time to trial has been moved up, it was not
6 brought up in our presentation of the Fintiv section in
7 our response.
8 And to me, it would be unfair to have a
9 narrow stipulation first and then wait to see what the
10 preliminary response says and then switch to a Sotera
11 stipulation. They could have provided their
12 stipulation shortly after their filing of the petition
13 or at any time before we prepared ours. Instead, they
14 waited four months.
15 I understand that they feel they're entitled
16 to it based on director's guidance, but I just feel
17 like, you know, it's unfair to allocate pages and time
18 to something that they could have prevented from the
19 very beginning.
20 JUDGE McKONE: All right. Any case law or
21 whatever that you'd like to direct us to that would
22 bind petitioner to file any stipulation at the time of
23 the petition? Petitioner cited to the NXP case which
24 seems to say that they're not -- that they can file it

1 later.
2 MR. FARJAMI: No, your Honor, I don't have a
3 case at this point. I just wanted to point out to the
4 unfairness and the fact that this could have been
5 easily brought up earlier, and the only reason they're
6 presenting now is the 19 months versus 24 months and
7 that was not even stated in our Fintiv response.
8 JUDGE McKONE: Okay. One, I guess, somewhat
9 related question: Have you reviewed the Sotera
10 stipulation? Is there any concern that the stipulation
11 itself is not a proper Sotera stipulation?
12 MR. FARJAMI: No, your Honor. I think the
13 stipulation itself is good.
14 JUDGE McKONE: Okay. All right. Let's move
15 to the second issue. I think it's particular to the
16 296 IPR, I believe, where petitioner is requesting
17 three pages to respond to a claim construction
18 argument.
19 Petitioner, would you please let us know
20 what relief you're asking for here.
21 MR. RADER: Yes. Thank you, your Honor. So
22 there's one claim construction argument that came up in
23 the preliminary response concerning the order in which,
24 according to the patent owner, two of the steps, which

1 we've labeled 1.e and 1.f, need to be performed, and
2 we'd like -- and we're trying to be very judicious
3 here. So we think three pages is sufficient for us to
4 address that.
5 The reason we're asking for it is that --
6 and the good cause for filing a reply to the
7 preliminary response on this one issue is that it was
8 not foreseeable that they -- that the patent owner
9 would argue that Steps 1.e and 1.f are required to be
10 performed in the order that they're recited in the
11 claim. There are -- Claim 1 of the '808 patent is a
12 method claim with ten different steps. As I'm sure
13 your Honors know, the default rule is that steps in a
14 method claim are not required to be performed in order.
15 There were two steps later in the claim,
16 which we pointed out in the petition, the logic and
17 grammar clearly we felt, you know, required them to be
18 performed in order, so we did address that, but these
19 two, at least in our view, there's no logic or grammar
20 to the claim and certainly no technical reason why they
21 need to be performed in order.
22 So if we would be expected to have addressed
23 that, we would have had to address, you know, the order
24 of all ten steps relative to one another, which

1 obviously would be an unreasonable expectation. So we
2 feel that given the unforeseeability of singling out
3 these two particular steps and arguing that they have
4 to be performed in order, that a brief reply on that
5 one claim construction issue would be reasonable.
6 There's good cause for it.
7 And the Board has, you know, I think
8 frequently recognized that short briefing on claim
9 construction can be valuable to the Board in reaching
10 an institution decision. In fact, you know, very often
11 it's simply agreed to, but here since it's contested, I
12 just wanted to explain why we feel there's good cause
13 for it.
14 JUDGE McKONE: Okay. And you're asking for
15 three pages, you said?
16 MR. RADER: Yes. We're asking for three
17 pages and, of course, you know, we -- we assume and
18 would not oppose and would support the patent owner be
19 given three pages in sur-reply as well so that the
20 Board has a full, you know, record of everyone's
21 arguments about that claim term.
22 JUDGE McKONE: Did you have a proposed
23 timing for the filing of the brief?
24 MR. RADER: We can be ready quickly,

1 certainly within seven days, but we could -- you know,
2 if desirable, we could be ready even faster than that.
3 JUDGE McKONE: Okay. Do you have anything
4 else on this issue before I turn it over to patent
5 owner?
6 MR. RADER: No, your Honor.
7 JUDGE McKONE: All right.
8 Mr. Farjami, it's your turn.
9 MR. FARJAMI: Thank you, your Honors. Yes,
10 the issue here is clearly foreseeability, and the
11 petitioner has already presented its claim construction
12 for sequence of steps on pages 8 to 10 of the petition
13 with respect to other claim elements, and they
14 presented arguments based on their own interpretations
15 of Steps 1.e and 1.f when they discussed prior art. So
16 the question is: Was it foreseeable that we would say
17 the claim -- the sequence of steps would be in the
18 order that they were listed.
19 In terms of Mr. Rader's comment that the
20 logic and grammar and the technical description in the
21 spec, obviously we would take a very different
22 viewpoint of that, but I don't think that is the issue
23 here. The issue here is was it foreseeable. You have
24 Claim Elements 1.e and 1.f and they're listed in

1 sequence and it was foreseeable that we would take that
2 position. It was not certain but it was foreseeable,
3 and so there's only two options here: Either you
4 choose one sequence or a different sequence, and it was
5 foreseeable that we would choose one of the two.
6 So -- and if this is the standard, then I
7 would submit that any time a petitioner wants to file a
8 reply even when there's a binary choice in interpreting
9 the claim order, they would get to file a reply. So I
10 don't -- I do not --
11 JUDGE McKONE: The default, is petitioner
12 correct, I do believe the default is that steps of a
13 method claim are not construed to have an order to the
14 steps unless there's something about the claims of the
15 specification that would suggest otherwise. Why isn't
16 it appropriate for petitioner to simply rely on that
17 default and not have to, in every case, brief the order
18 of steps? That would seem, in most cases, unnecessary.
19 MR. FARJAMI: Yes, your Honor. There is the
20 general default. However, I would have two responses
21 to that. One is that they chose to specify order of
22 steps with respect to other -- to another two steps in
23 the claim that were not even as critical, but that gets
24 to the substance that I do not think is appropriate to

1 get to here. And my other response is that yes, it's a
2 general default, but in light of even the claim logic
3 itself and in light of the specification and in light
4 of the prior art that they wanted to present, it was
5 very clearly an issue for them to say why -- to present
6 why their sequence of claim sets can be reversed, which
7 is what they're doing.
8 So, again, it comes down to foreseeability,
9 and they had a -- it's a binary choice and I think it
10 was very foreseeable to them that we would just choose
11 what we would think would make sense and it was clearly
12 supported by the spec, but that gets into the substance
13 again. But in terms of foreseeability, when you only
14 have two options, I don't think they could say that we
15 just relied on the default.
16 JUDGE McKONE: Okay. Anything else on this
17 point, Patent Owner?
18 MR. FARJAMI: The only other point I wanted
19 to mention, your Honor, is that I believe the Board has
20 both sides' arguments at this point. They have already
21 taken a position even though they have not expressly
22 stated it. They have taken a position. It will become
23 apparent they're just looking at their treatment of the
24 prior art, but I believe that both sides' positions are

1 before the Board at this point.
2 JUDGE McKONE: Okay.
3 Petitioner, do you have anything else to say
4 on this issue?
5 MR. RADER: No, your Honor, I don't have
6 anything else.
7 JUDGE McKONE: Okay. Your third issue as I
8 understand it is that in the 389 case, you're
9 requesting leave to file a reply brief, five pages on a
10 couple of claim construction issues; is that correct?
11 MR. RADER: Yes, that's correct.
12 JUDGE McKONE: Go ahead and explain that to
13 us, please.
14 MR. RADER: Okay, sure. So, again, on both
15 of these, and I'll briefly address each of them, it's a
16 foreseeability issue. So one of them is the claim
17 language "connection via metal," and the -- this is
18 Limitation 1C of the '143 patent. It recites a
19 "connection via metal extending from the first surface
20 to a second surface of the semiconductor substrate."
21 That's all it says about where the connection via metal
22 starts and ends. It goes from the first surface to the
23 second surface.
24 In the patent owner's preliminary response,

1 they argued that the Board should construe this term as
2 requiring that the connection via metal connect to
3 readout circuitry, which is not recited in Limitation
4 1C. It's mentioned in a completely different claim
5 limitation, 1A. It's -- that "readout circuitry"
6 language is totally about sent from the "connection via
7 metal" limitation.
8 In our view, it's a classic case of, you
9 know, reading a completely nonexistent claim limitation
10 into a particular claim term. So we just could not
11 have foreseen that that argument would be made, and
12 we'd like to briefly point that out and explain why,
13 you know, under the circumstances here, that would be
14 an improper claim construction.
15 That's all I have to say about that one.
16 I'm happy to address the second one or if you want to
17 take them one at a time, you know, stop here.
18 JUDGE McKONE: Why don't you go ahead and
19 address the second one, and then I'll turn it over to
20 patent owner to address both.
21 MR. RADER: Okay. So the second claim
22 limitation is "surrounding a portion of the lateral
23 side of the projection part." This is a little bit
24 further down in the claim. It's talking about the

1 insulating layer which has to surround a portion of
2 something, and the petition showed how the insulating
3 layer in the prior art surrounds the lateral side of
4 that part, the projection part.
5 In the patent owner's preliminary response,
6 they took the position that "surrounding a portion"
7 requires surrounding -- ruled out surrounding the
8 entire part, that a portion, in effect, should be
9 construed as only a portion and not the entire part,
10 and this we don't think was foreseeable because the
11 Federal Circuit has dealt with limitations like this at
12 least a few times that we're aware of and has
13 consistently found that, you know, if you, you know,
14 for example, dispose over a portion, scanning a
15 portion, things like that, that if you're disposed over
16 the whole thing, you by definition are disposed over a
17 portion. If you scan the whole thing, you scan a
18 portion.
19 Similarly here, this is kind of similar to
20 the '808 patent, the order of the steps issue in that,
21 you know, it's where the default rule is that, you
22 know, there's no order of the steps. Down here, the
23 Federal Circuit has frequently found that when you have
24 to, you know, be disposed over or surround or scan a

1 portion of something, doing the whole thing does that
2 and more. And so we could not have expected that they
3 would take a position contrary to what the Federal
4 Circuit has said, and we'd like to just have the
5 opportunity again to point that out and, of course,
6 both sides can make their arguments about that in the
7 reply and the sur-reply.
8 JUDGE McKONE: Anything else on this issue?
9 MR. RADER: That's it from the petitioner,
10 your Honor.
11 JUDGE McKONE: Okay. And the timing of the
12 briefing that you had proposed would be the same as for
13 the other claim construction issue, seven days for each
14 brief unless we state something different?
15 MR. RADER: Yes, I agree.
16 JUDGE McKONE: Okay.
17 I'll turn it over to patent owner, but
18 before I forget to ask about it, if we do decide to
19 permit briefing, Patent Owner, do you have a view on
20 what the timing of the briefing ought to be assuming
21 that we would authorize both a reply and a sur-reply?
22 MR. FARJAMI: Yes, your Honor. I would
23 think that seven business days for each side would be
24 appropriate.

1 JUDGE McKONE: Okay. With that, please
2 respond to the petitioner's arguments on the two claim
3 construction issues in the 389 proceeding.
4 MR. FARJAMI: Okay. Thank you, your Honor.
5 Yes. With respect to the "connection via metal," I'll
6 be brief, and I will address the "surrounding a portion
7 of" in a little bit more detail, if I may.
8 With respect to the "connection via metal,"
9 the word "connection" is basically in the claim without
10 specific reciting what is being connected to what. So,
11 again, from our point of view, it is foreseeable that
12 the patent owner or anybody reading the claim would
13 want to give a meaning to the term "connection," what
14 is being connected to what and that -- that is what we
15 did and it was foreseeable that we would do that.
16 So I respectfully do not agree that it was
17 totally unforeseen that a term that is used in the
18 claim and is repeated frequently in the spec but is
19 only said in the claim without specifying what is being
20 connected to what. So we needed to interpret that, and
21 I will believe -- I would -- you know, the Board of
22 course would be interested to have our interpretation,
23 and it was foreseeable that patent owner would
24 interpret that claim term.

1 May I move to the second claim element at
2 this point?
3 JUDGE McKONE: Please do.
4 MR. FARJAMI: Yes. Now, with respect to
5 "surrounding a portion of a lateral side of the
6 projection part," the first thing I wanted to say, your
7 Honors, is that the petition did not specify where this
8 claim element is found, and this goes to
9 foreseeability. That's why I'm mentioning this. They
10 did not specify where this claim element is found in
11 the prior art relied upon, which is in contravention of
12 37 CFR 42.104 as you're well aware. And so it's more
13 than foreseeable that the patent owner would point out
14 that this operative language meaning "surrounding a
15 portion of" is entirely missing from the discussion.
16 It only appears in section headings, in three section
17 headings.
18 There is no discussion of this term at all.
19 There is no recitation. It doesn't even get recited
20 once, and one could even ask petitioner's counsel now
21 if they even recited it once, and they did not in the
22 petition. So it's very foreseeable that we would point
23 this out, and essentially it left us in the dark
24 regarding what their contention was to where this claim

1 element is found in the prior art.
2 So the question -- so the question is that
3 it was -- it was not just only -- it was completely
4 foreseeable that we would point this out. And also,
5 like, we have to take a position as to what this claim
6 element means when we point it out. And, again, there
7 are only two options here, similar to the other
8 discussion we had, that the term "a portion" --
9 "surrounding a portion of" could mean either partially
10 surrounding or at least partially surrounding. It's
11 just a binary choice, and they did not specify what
12 their interpretation is, let alone -- they did not even
13 discuss it, let alone specify what their interpretation
14 is.
15 So I believe that --
16 JUDGE McKONE: For something like "portion
17 of," you disagree that under Federal Circuit law,
18 essentially the default would be that the portion can
19 include the whole?
20 MR. FARJAMI: Your Honor, I do not believe
21 there is a default as a general rule in a vacuum if
22 someone says "comprising a portion of," which was not
23 the case here, but hypothetically if a patentee says "a
24 portion of," "comprising a portion of," in a vacuum,

1 one could argue that it would mean at least a portion.
2 However, we have found case after case,
3 which we can cite later if we need to, that a portion
4 is very specific to what the specification requires.
5 The specification could clearly point to the fact that
6 a portion means partial, not -- not at least partial.
7 So I definitely disagree that there is no definite
8 meaning to the term "portion." It all depends on the
9 context.
10 And I do not believe Federal Circuit has
11 ever said that a term "a portion" would always mean
12 this regardless of the circumstances. And the point,
13 again, comes down to foreseeability and whether we
14 could take one option or the other. And they -- so I
15 wanted to go on and mention, please, that the patent
16 owner, we believe that if a message is sent to all
17 petitioners that you can just go ahead, ignore 37 CFR
18 42.104, do not even discuss the claim elements at all
19 in the petition, and then it's okay to address it later
20 by way of a reply, that not only the requirement of
21 good cause would be meaningless but it would be okay to
22 contravene the requirements of 37 42.104 to specify
23 where each claim element is found in the prior art.
24 In the petition itself, that section

1 requires the petitioner to specify in the petition
2 itself, and as a practical matter, what this -- the
3 position we were put in is that we had to draft
4 interrelated portions of the preliminary response, you
5 know, take -- not knowing what their position is. And
6 even if, at this point, for example, they're permitted
7 to file a reply, we cannot go back and rewrite our
8 preliminary response based on what they're going to
9 present that their position is at this point after our
10 preliminary response has already been filed. That --
11 JUDGE McKONE: Well, a couple of things on
12 that though. If we were to authorize claim
13 construction briefing, that wouldn't be authorization
14 for either party to brief where something might be
15 found in the prior art. That's -- the application of
16 the prior art to the claim is different than the claim
17 construction briefing, which is what petitioner is
18 requesting.
19 MR. FARJAMI: Yes, your Honor. I completely
20 understand that, and I appreciate that you mentioned
21 this. However, I think the issue is so intertwined.
22 In essence, it 's very foresee -- in essence, what the
23 petitioner would want to present is that their claim
24 construction obviously will have to be at least

1 partially and not partially, and then that would, in
2 essence, mean that, well, we did address or we did
3 discuss the claim elements.
4 But if we completely can separate the
5 issues, I agree with you, your Honor, but I think
6 because they're so intertwined that, in effect, it's a
7 back door for a petitioner to fill a gap that to me,
8 unfortunately, I believe they intentionally left out
9 because every other claim element has been discussed
10 except this one and how could they not foresee an
11 operative language like "partially surrounding a
12 portion of lateral side"? How could they miss it?
13 So I just believe that it will just give an
14 opportunity to fill in a gap as to why a claim element
15 was not discussed at all, and it would take away -- and
16 it would be fundamentally unfair to us because we
17 drafted the preliminary response one way based on the
18 fact that we allocated pages to address the issue that
19 they did not discuss this claim element at all.
20 JUDGE McKONE: Okay, but as far as your
21 position on whether or not the art meets the claim
22 language under your construction, if we authorize
23 additional briefing on that, we're not saying that
24 you've lost that issue or that you ought to be changing

1 your position on that issue. It's just simply we would
2 be authorizing additional information on the meaning in
3 the claim.
4 MR. FARJAMI: Yes, your Honor, except that I
5 think, again, the reason we have the 37 CFR section is
6 to not to be prejudicial to the patent owner. Once we
7 drafted the reply -- our response based on the reading
8 of the petition and the fact that it did not discuss
9 the claim elements, it would be unfair at this stage
10 for them to not only discuss the claim element but also
11 provide an interpretation. And, again, it also goes
12 back to foreseeability. It was a very clear choice. A
13 portion either means partially or at least partially,
14 and they could foresee that they needed to discuss
15 that.
16 JUDGE McKONE: Anything else on these two
17 claim construction issues?
18 MR. FARJAMI: No, your Honor.
19 JUDGE McKONE: All right. I'll let
20 petitioner have a short response, but I will mention,
21 as I did for patent owner, if we were to authorize
22 claim construction briefing, that's what we would be
23 authorizing. We would not be authorizing any kind of
24 briefing that would fill in the gap of mapping the

1 prior art to the claims.
2 Petitioner, is that understood?
3 MR. RADER: Yes, we understand, your Honor.
4 JUDGE McKONE: With that, is there anything
5 else you'd like to say on these two issues?
6 MR. RADER: No. Only for the record, since
7 the patent owner's counsel suggested we somehow missed
8 this limitation, I'll just state for the record that
9 this limitation was fully addressed on pages 30 and 31
10 of the petition both in the text and also a very
11 carefully, you know, colorized figure that shows the
12 lateral sides of the projection part. It shows the
13 insulating layer, and we just have this one issue
14 that's arisen in the preliminary response.
15 And we absolutely understand and would
16 limit, if the Board authorizes it, our briefing only to
17 the claim construction issue. We don't need to add
18 anything to what we've already included in the petition
19 about how the -- about how the prior art maps onto the
20 claim.
21 JUDGE McKONE: All right. Anything else
22 before I put you on mute for a couple minutes?
23 MR. FARJAMI: Your Honor, just one comment
24 is that if petitioner's counsel would state that

1 whether they even recited the operative language
2 "surrounding the portion of a lateral side" even for
3 once, I think the answer would be no.
4 JUDGE McKONE: That's something that we can
5 evaluate when we evaluate the papers.
6 Anything else? All right. I'm going to put
7 you on mute and we'll discuss this and we'll come back
8 with a ruling on these three issues in just a couple
9 minutes.
10 (A brief recess was taken.)
11 JUDGE McKONE: This is Judge McKone. Thank
12 you for being patient with us. We are going to
13 authorize all three of the items the petitioner has
14 requested. So petitioner is granted leave to file in
15 each of the cases the Sotera stipulation. There's
16 nothing that we can see in the case law that would
17 prevent petitioner from filing a Sotera stipulation
18 provided that it's before we institute a case or decide
19 not to institute.
20 As far as whether or not the Sotera
21 stipulation needs to be filed in the district court,
22 we'll leave that to the parties. It 's not our place
23 to tell a district court how to manage its docket. So
24 if the parties feel that they need to file the

1 stipulation with the district court, that's something I
2 encourage you to meet and confer and decide on.
3 As far as the claim construction briefings,
4 we find that all three issues would not have been
5 reasonably foreseeable that patent owner would have
6 raised the issues that it did. The petitioner,
7 although has an obligation to construe the claim terms
8 it believes are at issue, that doesn't carry with it an
9 obligation to construe every possible claim term or
10 anticipate every possible claim construction issue that
11 might arise. In this case, we do not find that these
12 three issues would have reasonably been foreseeable.
13 So we're going to authorize briefing on those three
14 issues.
15 I will caution both parties, petitioner and
16 patent owner, that we are into and we see the
17 possibility that there may -- that there could be some
18 gap-filling on the merits of matching the prior art to
19 the claims. We are not authorizing that as part of the
20 briefing, simply the claim construction issues only,
21 and we will pay attention to whether or not the parties
22 stick to the claim construction issues.
23 It sounds like the parties have agreed that
24 seven days, seven business days, for each round of

1 briefing is appropriate, so that is what we'll order.
2 So to be clear, in IPR 2023-00296, petitioner is
3 authorized to file a three-page reply brief on the
4 issue of the claim construction of the order of Claim
5 Steps 1.e and 1.f, and that will be due within seven
6 days of this conference call.
7 Patent owner is authorized to file a
8 three-age sur-reply responsive to the issues that
9 petitioner raises in the reply brief, and that will be
10 due seven days from when petitioner files its reply
11 brief.
12 And in IPR 2023-00389, petitioner is
13 authorized to file a reply brief of no more than five
14 pages addressing the two claim construction issues it
15 discussed in this conference call, and that will also
16 be due seven business days from this conference call.
17 And patent owner is authorized to file a
18 sur-reply brief, also five pages due seven days from
19 when petitioner files its reply brief and limited to
20 responding to the arguments that petitioner makes in
21 its reply brief.
22 Are there any questions about what we've
23 just ordered?
24 MR. RADER: Judge McKone, this is Michael

1 Rader for the petitioner. I just want to clarify one
2 thing. At one point, you mentioned "business days"; at
3 another point "days." Either is fine with us. I just
4 want to make sure we know, you know, if our deadline is
5 the 31st, which would be seven days from today, or some
6 later time because it's business days and we have
7 Memorial Day, etc.
8 JUDGE McKONE: Well, we're going to go with
9 business days. That is what patent owner agreed would
10 be the appropriate amount of time, and I think we have
11 enough time in the schedule to accommodate that. So
12 unless either party has a concern with seven business
13 days, we will go with seven business days for each
14 round.
15 MR. RADER: That's fine. Thank you, your
16 Honor.
17 MR. FARJAMI: Yes, thank you, your Honors.
18 The seven business days for the patent owner, would it
19 run from the day that we receive the reply if a reply
20 should be provided to us before seven business days or
21 would it be -- in other words, would it be 14 business
22 days from today regardless?
23 MR. RADER: Oh, for certainty let's make it
24 14 business days from today in both the 296 and the 389

1 proceedings. And thank you for asking for that
2 clarification.
3 MR. FARJAMI: Thank you.
4 JUDGE McKONE: All right. Since we've had a
5 court reporter on the call, I think the transcript of
6 this conference call should serve as an order in the
7 case. So unless either party objects, we will plan on
8 relying on the transcript here rather than issuing a
9 formal order later on.
10 MR. FARJAMI: No objection from me.
11 JUDGE McKONE: All right.
12 MR. RADER: No objection from petitioner.
13 JUDGE McKONE: Anything else from petitioner
14 today?
15 MR. RADER: No, thank you. No, your Honor,
16 nothing further.
17 JUDGE McKONE: Anything else from patent
18 owner today?
19 MR. FARJAMI: No. Thank you.
20 JUDGE McKONE: All right. And with that, we
21 are adjourned. Thank you very much.
22 (Conference call concluded at 3:42 p.m.)
23
24

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